

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC**

In the Matter of:

Request for Review and Waiver	)	
of the Decision of the	)	
Universal Service Administrator by	)	
	)	
Montgomery County School District	)	CC Docket No: 02-6
BEN Number: 126360	)	
	)	
Schools and Libraries Universal Service	)	
Support Mechanism	)	
	)	
Wireline Competition Bureau	)	

**REQUEST FOR REVIEW AND WAIVER**

**INTRODUCTION**

Section 54.719(c) of the Commission's rules provides that any person aggrieved by an action taken by a division of the Universal Service Administrative Company may seek review from the Commission.<sup>1</sup> Montgomery County School District (Montgomery) hereby appeals the current action taken by USAC in the following case.

**BACKGROUND**

On October 19, 2006, Montgomery received a Program Integrity Assurance (PIA) question requesting Montgomery to substantiate their National School Lunch Program (NSLP) data. A copy of the relevant PIA question dated 10-19-2006 and the response are

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<sup>1</sup> 47 C.F.R. § 54.719(c).

attached as Exhibit A. Montgomery responded to the PIA question on October 30, 2006. After the PIA response was received, the PIA reviewer called to substantiate the NSLP numbers. The PIA reviewer wanted a 3<sup>rd</sup> party validation of the NSLP numbers from someone other than a school district official. The e-mail question and response between the PIA reviewer and Montgomery's E-rate consultant are included as Exhibit B.

On December 20, 2006, Montgomery received funding commitment decisions for the following Internal Connections FRNs listed below.

FRN	Service Provider	Status	Requested	Committed
1476538	Netcom Technologies, Inc.	NOT FUNDED	\$17,280.00	\$0.00
1467148	Verizon Network Integration Corp.	NOT FUNDED	\$265,420.80	\$0.00
1466980	Verizon Network Integration Corp.	FUNDED	\$66,355.20	\$64,143.36
1466351	Netcom Technologies, Inc.	FUNDED	\$4,320.00	\$4,176.00
<b>Total</b>			<b>\$353,376.00</b>	<b>\$68,319.36</b>

The SLD reduced the discount rate percentage for FRN Nos. 1466980 and 1466351 and gave the following reason: "The shared discount was reduced to a level that could be validated by third party data." Both of the FRNs were funded, but at a reduced rate. The SLD denied FRN Nos. 1476538 and 1467148 as being under the threshold discount level. Both of these FRNs were originally filed as 80% funding requests and would have met the threshold discount level had the discount level not been reduced. With the discount level reduction these FRNs fell below the threshold and were denied.

## **DISCUSSION**

Montgomery provided the requested NSLP data to the SLD. When the SLD compared the numbers provided by Montgomery to the state's website, there were sites where the lunch numbers differed. When asked to explain the difference, Montgomery contacted the state, and eventually it was discovered the NSLP data Montgomery used to apply for

E-rate funding came from a different day of the month than the state posted on the state website. Montgomery used certified NSLP data from September 30, 2005, available for District use October 1, 2005. The state chose to post NSLP data that Montgomery turned in for a different time period. Both sets of numbers were valid NSLP data. The NSLP data used to apply for E-rate funding was certified by Montgomery's Director of Reporting and Regulatory Accountability.

The FCC Form 471 Instructions require an applicant to "(p)rovide the number of students eligible for NSLP as of the October 1<sup>st</sup> prior to the filing of this form, or use the most current figure available."<sup>2</sup> No directions are given as to certification or verification of the NSLP numbers by a third party. Instead, the NSLP data is self-certified, as is much of the other information an applicant provides to the SLD. For items such as technology plans that require third party verification, the SLD provides applicants with a list of approved third parties for certification and guidelines for what information is required for certification.

Montgomery asked the PIA reviewer for further guidance with the third party verification. As Exhibit B shows, Montgomery never received a response from the reviewer except to tell them self-certification would not be acceptable. Instead, Montgomery would argue the Form 471 was correctly filed. Montgomery used their NSLP numbers as of October 1, 2005, as the instructions for the Form 471 state. The reduction of Montgomery's discount rate by the PIA reviewer amounts to a rule change in the E-rate program. Montgomery was given no notice of change and still has not received a satisfactory explanation of how to be in compliance with this new third party validation requirement.

Montgomery is also confused as to how the new requirement of validating discount numbers is being applied. All of Montgomery's Priority One requests were reviewed by a separate PIA reviewer. That reviewer accepted the support of Montgomery's NSLP data as provided and those FRNs have all been approved at the discount percentage rates

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<sup>2</sup> See FCC Form 471 Instructions for Item 9a, Column 5, dated November 2004.

requested. The Priority Two requests were reviewed by a separate reviewer who reduced the discount rate percentages to match the numbers on the state website. It does not appear there is a set, universally applied standard to validate NSLP data.

The basic requirement seems to be that a school district's lunch numbers must match the numbers on the state website. This new standard of verification will cause some fundamental problems for applicants.

Montgomery can only report their NSLP numbers monthly as required to the state. Montgomery does not have any control over their NSLP numbers at that point. Montgomery cannot control such factors as what month the state will choose to post on their website and if the numbers are correctly entered to the state's web-site. Also the school districts cannot control how often the state updates their numbers. Quite often the numbers the SLD would be using to verify NSLP numbers may be out of date or as in Montgomery's case, the school district may use a different month than the month the state chooses to post on their website.

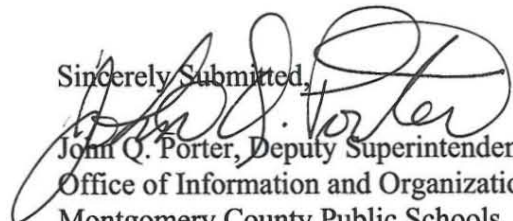
To require third party validation of NSLP lunch numbers without giving applicants prior notice is fundamentally unfair. The SLD has basically changed the "rules" of E-rate applications without giving notice to the participants in the program. At the very least, Montgomery would request the FCC to grant a waiver of this new requirement and remand the FRNs to the SLD with instructions to increase the discount rate.



## SUMMARY

Montgomery requests that the discount rate percentage reductions be reversed and the above referenced FRNs be funded at the discount rates originally requested by Montgomery. In the alternative, Montgomery would request that the third party validation requirement be waived and the FCC order the SLD to accept the numbers Montgomery has provided as verification of the requested discount rate.

Sincerely Submitted,



John O. Porter, Deputy Superintendent  
Office of Information and Organizational Systems  
Montgomery County Public Schools  
850 Hungerford Drive  
Rockville, MD 20850-1718

## **Exhibit A**

### **FCC Form 471 Program Integrity Assurance Response**

**Montgomery County MD School District  
Funding Year 2006**

**Application No. 494183**

To: Rich DiGiovanna  
PIA Initial Reviewer

From: Carla Chupik  
Funds For Learning

Date: October 25, 2006

RE: PIA Response for Application 494183

Attached is our response to the PIA request dated October 19, 2006  
regarding Montgomery County MD School Districts Form 471 Application  
494183.

471AN: 494183

Question No: 2

RE: Oak View Elementary School

Georgian Forest Elementary School

Question:

*22665 Oak View Elementary School Montgomery. Requested 90%*

*22735 Georgian Forest Elementary School Montgomery. Requested 80%*

*Based upon review of your Form 471 application, we were not able to validate your requested discount percentage for all the entities. If you choose to validate your original requested discount percentage of above, then please provide the appropriate documentation exactly as requested if one of the following acceptable methods were used:*

- a. If the school participates in a National School Lunch Program (NSLP), please provide us a signed copy with title (preferably the Principal, Vice-Principal, superintendent or Chief school official, or Director of Food Services ) of the October Reimbursement Claim Form (preferably reporting data as of October 31<sup>st</sup>) that the school sends to the state each month. Make sure the following 3 items are identified:*

- 1) The Entity name*
- 2) The total number of students enrolled at the entity*
- 3) The total number of students eligible for Free/Reduced Lunch Program for the entity. Please note that the requirement is students, not meals.*



OR

*b. If the school district fills out an aggregate form for the school district provide the following:*

*1) A signed letter from a school official (preferably the Superintendent but not Food Services Director) that lists the Free/Reduced and enrollment information for each school in the district for a given month and that adds to the enrollment and free and reduced count totals exactly*

*2) A signed copy (preferably by the Principal, Vice-Principal, Superintendent, or Director of Food Services) of the Reimbursement Claim Form that the school sends to the state for the same month.*

**RESPONSE:**

Please find attached the following documents to support the enrollment count and the number of applicants on file for qualifying students that are eligible to participate in the National School Lunch Program in the Montgomery County School District for Oak View Elementary School and Georgian Forest Elementary School.

- (1) Monthly Statistical Data Reimbursement Report submitted to the Maryland Department of Education for September, 2005 signed by the Acting Director of Food and Nutrition Services
- (2) Free and Reduced Price Meals (FARMS) Report dated September 30, 2005 submitted to the Maryland Department of Education for September, 2005 signed by the Director of the Department of Reporting and Regulatory Accountability.  
The two schools in questions, Georgian Forest and Oak View have their enrollment and FARMS numbers highlighted.

This is the September, 2005 NSLP data of students eligible for the program as of October 1, 2005 as required on the FCC Form 471 instructions.

Maryland State Department of Education  
Nutrition and Transportation Services Branch  
MONTHLY STATISTICAL DATA REIMBURSEMENT REPORT

(A) SPONSOR NUMBER: C1600913

(D) TELEPHONE: (301) 840-8170

(B) SPONSORING AGENCY: MONTGOMERY COUNTY PUBLIC SCHOOLS

(E) PERIOD COVERED BY REPORT:

(C) ADDRESS: 830 HUNGERFORD DRIVE  
ROCKVILLE, MD 20850

SEPTEMBER, 2008

	NATIONAL SCHOOL LUNCH PROGRAM	SCHOOL BREAKFAST PROGRAM		SPECIAL MILK PROGRAM	AFTER SCHOOL SNACK PROGRAM	
		REGULAR	SEVERE NEED		REGULAR	AT RISK
1. Number of Sites Approved	302	78	105		1	20
2. Number of Sites Reporting	202	78	105		1	3
3. Number of Operating Days	21	21	21		3	3
4. Average Daily Participation	51,769	2,639	11,336		22	118
5. Meals/Milk Served to Children						
A. Free Meals/Milk	357,488	28,317	127,578		30	358
B. Reduced-Price Meals	136,188	8,081	36,329		8	0
C. Paid Meals/Milk	594,976	24,066	74,171		30	0
TOTAL	1,087,652	59,423	238,078		68	358
6. ATTENDANCE FACTOR 94.1%						

I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE AND BELIEF, THIS CLAIM FOR REIMBURSEMENT IS TRUE AND CORRECT IN ALL RESPECTS; THAT RECORDS ARE AVAILABLE TO SUPPORT THIS CLAIM AND THAT IT IS IN ACCORDANCE WITH THE EXISTING AGREEMENT.

10/07/05  
(F) DATE OF PREPARATION

*Richard M. Bennett*  
(G) SIGNATURE OF AUTHORIZED REPRESENTATIVE

MSDE-WNDR, 05/02

6/28/06  
Date

*Sharon E. Smith*  
Acting Director of Food and  
Nutrition Services

Jun 28 2006 15:21 P.01  
Jun 28 2006 15:21 P.01  
Jun 28 2006 15:21 P.01

Fax: 301-840-8558  
Fax: 301-279-5679  
Fax: 301-840-8558

DOFO

School	Level	No.	Total 9/30/05 Enrollment	FARMS No	FARMS Yes
Laytonsville	ES	51	501	426	75
Clopper Mill	ES	100	469	260	209
Clarksburg	ES	101	863	566	97
Germantown	ES	102	471	322	149
Seneca Valley	HS	104	1687	1331	356
Ridgeview	MS	105	845	686	179
Fox Chapel	ES	106	563	353	210
King (Martin Luther)	MS	107	857	589	268
Lake Seneca	ES	108	360	253	107
Waters Landing	ES	109	636	471	165
McAuliffe (S. Christa)	ES	110	825	432	193
Daly (Cpt. James)	ES	111	519	272	247
Neelsville	MS	115	727	420	307
Quince Orchard	HS	125	1910	1632	278
Poolesville	HS	152	861	835	26
Poolesville	ES	153	441	376	65
Parks (Rosa M)	MS	155	928	833	95
Rockwell (Lois)	ES	156	455	360	95
Clemente	MS	157	1132	852	280
McNair (Ronald)	ES	158	744	589	155
Carson (Rachel)	ES	159	726	582	144
Montgomery (Richard)	HS	201	1944	1631	313
Garrett Park	ES	204	451	365	86
Twinbrook	ES	206	531	218	313
Beall	ES	207	599	400	199
Lakewood	ES	209	587	556	31
Maryvale	ES	210	645	407	238
West (Julius)	MS	211	1021	711	310
Meadow Hall	ES	212	354	204	150
Sandburg (Carl)	ES	215	90	37	53
Travilah	ES	216	459	414	45
Farmland	ES	219	577	540	37
Luxmanor	ES	220	333	289	44
Beverly Farms	ES	226	563	514	49
Ritchie Park	ES	227	367	296	69
Hoover	MS	228	1085	1006	79
College Gardens	ES	229	490	407	83
Rockville	HS	230	1253	1016	237
Tilden	MS	232	826	654	172
Fallsmead	ES	233	538	476	62
Wootton	HS	234	2407	2298	109
Wayside	ES	235	628	594	34
Twain (Mark)	SS	236	93	34	59
Frost (Robert)	MS	237	1141	1044	97
Cold Spring	ES	238	429	406	23
Alternative Program -Karma	SS	239	13		13
Alternative Program -Fleet Street	SS	239	9	3	6
Alternative Program -Phoenix, McKenney Hills	SS	239	17	14	3
Alternative Program -Phoenix, Emory Grove	SS	239	12	9	3
Alternative Program -Kingsley	SS	239	13	7	6
Alternative Program -McKenney Hills	SS	239	32	19	13
Alternative Program -Hadley Farms	SS	239	6		6
Alternative Program -Emory Grove	SS	239	37	18	19
Alternative Program -Glenmont	SS	239	6	2	4
Alternative Program -Randolph Academy	SS	239	34	24	10
Duffel	ES	241	475	441	34
Ride (Sally)	ES	242	545	359	186



School	Level	No.	Total 9/30/05 Enrollment	FARMS No	FARMS Yes
Marshall (Thurgood)	ES	244	572	448	124
Northwest	HS	246	1962	1667	275
Poole (John)	MS	247	384	340	44
Forest Oak	MS	248	871	514	357
Burlonsville	ES	302	599	447	152
Fairland	ES	303	525	313	212
Broad Acres	ES	304	496	61	435
Jackson Road	ES	305	544	251	293
Cloverly	ES	308	489	431	58
Burnt Mills	ES	309	529	237	292
Cannon Road	ES	310	387	223	144
Key (Francis Scott)	MS	311	809	464	345
Page (Wm Tyler)	ES	312	386	261	125
Galway	ES	313	702	435	267
Paint Branch	HS	315	1768	1459	309
Stonegate	ES	316	448	378	70
Blake	HS	321	1997	1789	208
Banneker	MS	333	838	571	267
Greencastle	ES	334	608	324	284
Briggs Chaney	MS	335	953	717	236
Darnstown	ES	351	418	386	32
Jones Lane	ES	360	510	393	117
Bethesda	ES	401	424	385	59
Chevy Chase	ES	403	432	347	85
Somerset	ES	405	389	358	31
BCC	HS	406	1691	1548	143
Westbrook	ES	408	308	278	30
Bradley Hills	ES	410	388	375	13
Westland	MS	412	972	843	129
North Bethesda	MS	413	695	614	81
North Chevy Chase	ES	415	315	275	40
Wood Acres	ES	417	607	571	36
Burning Tree	ES	419	525	490	35
Bannockburn	ES	420	353	337	16
Wyngate	ES	422	526	490	36
Johnson (Walter)	HS	424	1983	1862	121
Ashburton	ES	425	559	476	83
Whitman (Walt)	HS	427	1869	1842	27
Pyle (Thomas)	MS	428	1309	1237	72
Sherwood	ES	501	479	395	84
Olney	ES	502	612	537	75
Sherwood	HS	503	2240	2001	239
Westover	ES	504	282	242	40
Barnsley	ES	505	577	438	139
Flower Valley	ES	506	471	389	82
Farquhar	MS	507	725	610	115
Candlewood	ES	508	339	293	46
Magruder	HS	510	2185	1818	367
Cashell	ES	511	338	273	65
Greenwood	ES	512	580	518	62
Belmont	ES	513	409	363	46
Resnik (Judith)	ES	514	566	375	191
Sligo Creek	ES	517	633	491	142
Brooke Grove	ES	518	471	369	102
Shady Grove	MS	521	659	475	184
Lakelands Park	MS	522	541	430	111
Matsunaga	ES	523	1152	980	172

School	Level	No.	Total 9/30/05 Enrollment	FARMS No	FARMS Yes
Gateway to College Transition	SS	524	122	122	
Watkins Mill HS	HS	545	2048	1491	557
Goshen	ES	546	646	500	146
Flower Hill	ES	549	499	289	210
Gaithersburg	HS	551	2247	1738	509
Washington Grove	ES	552	381	172	209
Gaithersburg	ES	553	462	174	288
Gaithersburg	MS	554	776	525	251
Rosemont	ES	555	470	194	276
Mill Creek Towne	ES	556	481	308	173
Montgomery Village	MS	557	741	429	312
Whetstone	ES	558	578	328	250
Brown Station	ES	559	414	225	189
Watkins Mill	ES	561	593	319	274
Redland	MS	562	803	560	243
Summit Hall	ES	563	521	181	340
South Lake	ES	564	558	241	317
Sequoyah	ES	565	449	264	185
Fields Road	ES	566	492	365	127
Stedwick	ES	568	592	326	266
Strawberry Knoll	ES	569	547	348	199
Diamond	ES	570	405	334	71
Potomac	ES	601	527	496	31
Churchill	HS	602	2146	2080	66
Seven Locks	ES	603	251	235	16
Carderock Springs	ES	604	319	300	19
Cabin John	MS	606	994	903	91
Bells Mill	ES	607	484	392	72
Silver Spring Intl	MS	647	788	418	370
Monocacy	ES	652	231	196	35
Stone Mill	ES	653	683	626	58
Damascus	HS	701	1985	1828	157
Damascus	ES	702	333	287	66
Cedar Grove	ES	703	540	459	81
Woodfield	ES	704	429	377	52
Baker	MS	705	730	619	111
Clearspring	ES	706	630	476	154
Rocky Hill	MS	707	878	740	138
Kingsview	MS	708	938	755	183
Drew (Charles)	ES	747	491	315	176
Piney Branch	ES	749	496	298	198
Takoma Park	ES	754	402	294	108
Takoma Park MS	MS	755	958	753	205
East Silver Spring	ES	756	251	98	153
Blair	HS	757	3057	2285	772
Pine Crest	ES	761	398	203	195
Woodlin	ES	764	470	346	124
Oak View	ES	766	267	63	204
Glen Haven	ES	767	564	294	270
Oakland Terrace	ES	769	724	475	249
Rolling Terrace	ES	771	691	321	370
Viers Mill	ES	772	641	210	431
Rock Creek Forest	ES	773	494	360	134
Highland	ES	774	643	182	461
Eastern	MS	775	843	486	357
Montgomery Knolls	ES	776	376	171	205



School	Level	No.	Total 9/30/05 Enrollment	FARMS No	FARMS Yes
Weller Road	ES	777	563	227	336
Sligo	MS	778	588	331	257
Bel Pre	ES	780	488	234	254
Wheaton	HS	782	1438	865	573
Kensington Parkwood	ES	783	468	403	65
Highland View	ES	784	335	156	179
Georgian Forest	ES	786	431	205	226
Loiederman (A. Mario)	MS	787	791	384	407
Wheaton Woods	ES	788	670	238	432
Einstein	HS	789	1741	1205	536
New Hampshire Estates	ES	791	409	86	323
Newport Mill	MS	792	647	382	265
Rosemary Hills	ES	794	572	496	78
Rock View	ES	795	470	262	188
Northwood	HS	796	722	541	181
Harmony Hills	ES	797	512	116	394
Springbrook	HS	798	2064	1516	548
Stephen Knolls	SS	799	145	87	58
Forest Knolls	ES	803	513	332	181
Kemp Mill	ES	805	610	209	401
Brookhaven	ES	807	393	184	209
Cresthaven	ES	808	570	310	260
White Oak	MS	811	873	533	340
Parkland	MS	812	560	295	265
Kennedy	HS	815	1472	1042	430
Glenallen	ES	817	413	190	223
Lee (Col E. Brooke)	MS	818	582	284	298
Rock Creek Valley	ES	819	359	258	101
Wood (Earle B)	MS	820	918	674	244
Strathmore	ES	822	432	235	197
Argyle	MS	823	648	375	273
Rock Terrace	SS	916	101	44	57
Longview	ES	951	49	19	30
RICA	SS	965	146	104	42
			139311	103911	35400

*Karna Stenberg, director  
Department of Reporting and Regulatory Accountability*

## Exhibit B

**From:** Cathy Cruzan  
**Sent:** Monday, November 13, 2006 1:40 PM  
**To:** 'DiGiovanna, Rich'  
**Cc:** 'Walsh, Laurie'; Montgomery  
**Subject:** RE: PIA Response from Montgomery County School District (Second Request)

Rich,

Thank you for your prompt response and I hope you enjoyed your weekend. Please help us understand the change in third party validation from previous E-rate program year requirements. The FCC Form 471 instructions instruct a district to use the number of students eligible for NSLP as of October 1<sup>st</sup> prior to filing of the form or to use the most current figure available. The instructions allow further options such as "you may choose to use and actual count of students eligible for the NSLP or use federally approved alternative mechanisms to determine the level of poverty for purposes of the universal service discount program". In all prior E-rate years the SLD has accepted third party verification from the Nutritional Food Service Director or other school official designated to validate these numbers (typically other than the district official who signed the Form 471). No guidance is provided by the SLD that this third party verification must be by a state education department nor do the instructions indicate that the NSLP data used on the application has to match the same time period as what the district submitted to the state.

In most districts (especially large districts) the enrollment/NSLP data can vary from day to day and especially at different times of a month and/or year. The FCC further allows a district to use alternative discount methods as long as those methods are based on-or do not exceed- the same measure of poverty used by NSLP. The Montgomery County School District has provided PIA the monthly statistical Data Reimbursement Report, and FARMS report providing enrollment detail to support the monthly statistical data report for the end of September 2005 and was available on October 1<sup>st</sup>. This was the data used by the district for the 2006 E-rate applications on October 1<sup>st</sup> and the district has certified this information.

If the SLD is now going to request that third party validation be outside the district such as the state department then will it be a requirement that this information match exactly what the state reports going forward? Many state department websites post historically out of date data, sometimes this data is two years old. If the unwritten requirement is that the NSLP data on an applicants 471 application match the state reported data for the month of October then please provide further clarification or guidance about how a district can obtain this verification if it is not taken from the same time period that the state chose to post their reporting numbers. If the district uses an alternative method allowable under FCC rules does the district have to provide third party verification too?

We contacted the SLD Ombudsman on Friday to see if we could get additional guidance on the NSLP "Third Party Validation Request". Mr. Skankus was unable to pull the current request from the SLD internal system and indicated that we should contact you directly for further assistance and clarification. Any additional guidance you can provide is greatly appreciated.

Kind regards,

Cathy

**From:** DiGiovanna, Rich [mailto:RDIGIOV@sl.universalservice.org]  
**Sent:** Monday, November 13, 2006 7:27 AM  
**To:** Cathy Cruzan  
**Subject:** PIA Response from Montgomery County School District (Second Request)

494183-061113-AnsFAX-SCHOOL ADMIN DISTRICT 43

11/13/2006

Cathy,

Applicant self certification is not acceptable documentation. I need 3<sup>rd</sup> party documentation. As stated in the original request, documentation must come from the signed reimbursement form sent to the state ed dept. or from documentation on file in the stated ed dept. Please reference original request.

Sincerely,

Rich

Rich DiGiovanna  
Schools and Libraries Division  
Program Integrity Assurance  
**Voice: (973)-581-5107 - New**  
Fax: (973)-599-6576  
rdigiov@sl.universalservice.org  
Client Bureau Services Phone# 888-203-8100  
Solix Inc., Rm 2505  
P.O. Box 902  
100 South Jefferson Road  
Whippany, NJ 07981  
<http://www.sl.universalservice.org>



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**From:** Cathy Cruzan [mailto:ccruzan@fundsforlearning.com]  
**Sent:** Friday, November 10, 2006 3:14 PM  
**To:** DiGiovanna, Rich  
**Cc:** Walsh, Laurie; Carla Chupik; Montgomery  
**Subject:** RE: PIA Response from Montgomery County School District (Second Request)

Rich,

I left you a voice message but wanted to follow up in writing in regards to your question about the districts NSLP data used on the 2006 E-rate applications. The district was able to contact the State Department and verified that the numbers the state has available for that period are from a date later in the month of October. The data that the district used to report on the E-rate applications was the data available as of October 1, 2005 (September 30 data) as the Form 471 instructions indicate to use. The district has certified that this information is true and correct and has provided all requested information verifying that as of October 1<sup>st</sup>, this was the official information. Please let us know if any further information or documentation is needed to validate these two school sites in question.

Kind regards,

Cathy

Cathy Cruzan |

**Funds For Learning, LLC** | 501 S. Coltrane Road | Edmond, OK 73034

Direct 405.471.0965 | FAX 405.471-0923

[ccruzan@fundsforlearning.com](mailto:ccruzan@fundsforlearning.com) | [www.fundsforlearning.com](http://www.fundsforlearning.com) | [www.eratemanager.com](http://www.eratemanager.com)

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